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Attorney for Defendant
Robert Domm (sued herein as "Karl Domm")

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

MARKUS HEITKOETTER, an individual, and
ROCKWELL TRADING SERVICES, LLC, a
Texas Limited Liability company,

Plaintiffs,

vs.

KARL DOMM, an individual,

Defendant.

Case No.: 1:22-CV-00368-KES-BAM

**JOINT MOTION AND STIPULATION TO
RESET TRIAL, TRIAL CONFIRMATION
HEARING AND MOTION IN LIMINE
HEARING, and ORDER**

**JOINT MOTION AND STIPULATION TO RESET TRIAL, TRIAL CONFIRMATION
HEARING, AND MOTION IN LIMINE HEARING**

Plaintiffs Markus Heitkoetter and Rockwell Trading Services, LLC and Defendant-Counterclaimant Karl Domm (collectively, "the Parties"), by and through their respective counsel, request and stipulate that this Court reset the trial date, the trial confirmation hearing, and Motion in Limine hearing, currently set for trial on February 10, 2026, and trial confirmation hearing set for January 14, 2026. (D.E. 186 for trial date and D.E. 188 setting the trial confirmation hearing).

1 On October 22, 2025, this Court entered an order, pursuant to a joint stipulation, to continue
2 the trial date and certain pretrial dates and deadlines, including but not limited to filing objections
3 to trial exhibits, filing Trial Briefs, submitting final exhibit binders to the Court, and lodging
4 deposition transcripts with the Court. These dates and deadlines were established based upon an
5 expectation that the parties would proceed to trial on January 6, 2026.

6 The trial date was continued to February 10, 2026, due to unforeseeable conflicts with the
7 Parties proceeding on the earlier date. (D.E. 186). Subsequently, Plaintiffs asked for a later date
8 due to scheduling conflicts, and the Honorable Court proposed a trial date of March 24, 2026, at
9 8:30 a.m. The Parties were instructed to submit a stipulation and proposed order, and have done
10 so herewith.

11 Due to the continuance of the trial date, the Parties also request that the trial confirmation
12 hearing, currently set for January 14, 2026, be continued as well. A continuance of the trial
13 conference will allow the Parties to have the trial confirmation hearing closer to the date of trial,
14 avoid conflicts with December holidays, and counsel for Defendant's vacation in mid January.
15 The Parties mutually stipulate that the Court, in its discretion, continue the trial confirmation
16 hearing from January 14, 2026, to any of the agreed-upon dates as follows:

17 **February 17, 18, 19, or 20th of 2026;**

18 **March 2, 3, 4, 5 or 6th of 2026.**

19 This motion is made in good faith, and no party will be prejudiced. In addition, there is
20 only one motion in limine for the Court to rule upon. A continuance will allow the Parties
21 additional time to narrow the issues for their trial briefs closer to the trial date, and compile the
22 hard copies of exhibits, per the final Pretrial Order in this case, without it conflicting with the
23 December holidays and travel plans of the Parties.

24 In summary, due to the rescheduling of the trial until March 24, 2026, the Parties stipulate
25 and request as follows:

- 26 • The trial date be reset from February 10, 2026, to March 24, 2026, at 8:30 a.m.
- 27 • The Trial Confirmation Hearing and Motion in Limine Hearing be continued

1 from January 14, 2026, until any of the following dates: February 17, 18, 19,
2 or 20th. Or, March 2, 3, 4, 5, or 6th of 2026. All pretrial deadlines for January
3 14, 2026, are continued to the new Trial Confirmation Hearing date.

- 4 • The current deadline to object to evidence be continued from December 23,
5 2025, until January 23, 2026.

6 The Parties respectfully request the Court enter this Order.

IT IS SO STIPULATED

DATED: December 22, 2025

BUCKINGHAM, DOOLITTLE & BURROUGHS
LLC.

By: /s/ Andrew C. Stebbins

ANDREW C. STEBBINS

Attorney for Plaintiffs Markus Heitkoetter and
Rockwell Trading Services LLC
(signature affixed with permission)

VENABLE LLP

By: /s/ Lee S. Brenner

LEE S. BRENNER

Attorney for Plaintiffs Markus Heitkoetter and
Rockwell Trading Services LLC
(signature affixed with permission)

By: /s/ Susanne Arani

SUSANNE ARANI

Attorney for Defendant-Counterclaimant Karl Domm

ORDER

Upon consideration of the Joint Motion and Stipulation to Reset the Trial Confirmation Hearing, it is hereby granted that:

(1) The Trial date is reset from February 10, 2026, to **March 24, 2026, at 8:30 a.m.**

(2) The Trial Confirmation and Motion in Limine Hearing will be rescheduled from January 14, 2026, to **March 2, 2026, at 4:00 p.m.**

(3) All other pretrial deadlines currently set for January 14, 2026, are reset to **March 2, 2026.**

(4) The Parties shall have until **January 23, 2026**, to file objections to the opposing party's exhibits.

IT IS SO ORDERED.

Dated: December 22, 2025


UNITED STATES DISTRICT JUDGE